

# **EXHIBIT Y**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

|                                     |   |                                |
|-------------------------------------|---|--------------------------------|
| 1) VIDEO GAMING TECHNOLOGIES, INC., | ) |                                |
|                                     | ) |                                |
|                                     | ) |                                |
| Plaintiff,                          | ) |                                |
|                                     | ) |                                |
| v.                                  | ) | Case No. 4:17-cv-00454-GKF-jfj |
|                                     | ) |                                |
| 1) CASTLE HILL STUDIOS LLC          | ) |                                |
| (d/b/a CASTLE HILL GAMING);         | ) |                                |
| 2) CASTLE HILL HOLDING LLC          | ) |                                |
| (d/b/a CASTLE HILL GAMING); and     | ) |                                |
| 3) IRONWORKS DEVELOPMENT, LLC       | ) |                                |
| (d/b/a CASTLE HILL GAMING)          | ) |                                |
|                                     | ) |                                |
| Defendants.                         | ) |                                |

**VIDEO GAMING TECHNOLOGIES, INC.’S FIRST SET OF REQUESTS FOR  
ADMISSION TO CASTLE HILL GAMING**

Pursuant to Federal Rules of Civil Procedure 26 and 36, Plaintiff Video Gaming Technologies, Inc. serves the following requests for admission on Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC. VGT requests that Defendants respond to each request for admission within the time prescribed by the Federal Rules of Civil Procedure and the Local Rules of this Court.

**DEFINITIONS**

Unless a request specifically indicates otherwise, the following definitions are applicable throughout these requests and are incorporated into each request.

1. “Castle Hill Gaming,” “CHG,” “You,” “Your,” and “Yours” mean Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC; their parents, successors, predecessors, subsidiaries, affiliates and assignees thereof; their present and former officers, directors, agents, representatives, consultants, employees, and attorneys; and any

5. If You claim ambiguity in either the request for admission or a definition or instruction applicable thereto, identify in your response the language you consider ambiguous and state the interpretation you are using in responding.

6. If You are unable to answer any of these requests for admission fully or completely after exercising due diligence to secure the requested information, or if you assert that such information is privileged, state this fact, describe the nature of the efforts made to secure such information and the nature and basis for any privilege asserted, and answer each request to the fullest extent possible and describe the nature of any information withheld.

7. If Your response to any of the following requests for admission is anything other than an unqualified admission, explain the basis for that response, identifying all facts and documents that support or refute the response and any individuals having knowledge of such facts.

8. These requests for admission are continuing in character, so as to require You to serve supplemental responses promptly in accordance with Federal Rule of Civil Procedure 26(e).

### **REQUESTS FOR ADMISSION**

#### **REQUEST FOR ADMISSION NO. 1:**

Admit that at least one Former VGT Employee took VGT Documents with him/her when leaving VGT.

#### **REQUEST FOR ADMISSION NO. 2:**

Admit that at least one Former VGT Employee brought VGT Documents with him/her from VGT to CHG.